

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
GEORGE IVERSON, Individually,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 04-CV-12299-MLW
	)	
NEWPORT HOTEL GROUP, LLC,	)	
a Rhode Island Corporation, and JON E.	)	
COHEN, DOUGLAS D. COHEN and	)	
RENEE COHEN, as Trustees of Hyannis	)	
Harborview Resort Condominium Trust,	)	
	)	
Defendants.	)	
_____	)	

**DEFENDANTS' ASSENTED TO MOTION TO EXTEND THE TIME FOR  
THE FILING OF ITS RULE 26 (a) (2) EXPERT DESIGNATION AND  
DISCLOSURES**

Defendants Newport Hotel Group, LLC and Jon E. Cohen, Douglas D. Cohen and Renee Cohen as Trustees of Hyannis Harborview Resort Condominium Trust (collectively, "Defendants") hereby respectfully request that the Court extend the time for these Defendants to make their expert disclosures by thirty (30) days until August 15, 2005. Plaintiff has assented to this motion. Through the Scheduling Order entered in this case, the Defendants are required to designate any expert witnesses and provide the requisite expert disclosures by July 15, 2005. However, the parties are in the process of trying to settle this matter and have, in fact, exchanged settlement proposals. Defendants and the Plaintiff are trying to avoid the additional expense to the Defendants of preparing an expert report while these settlement negotiations are on-going. Accordingly, the Defendants request, with Plaintiff's consent, that Defendants' requisite expert

designations and disclosures under the current Scheduling Order be extended until August 15, 2005. No other dates in the Scheduling Order need to be changed.

Wherefore, the Defendants respectfully request that this motion be granted with the Plaintiff's assent.

Respectfully submitted,

NEWPORT HOTEL GROUP, LLC, AND JON E.  
COHEN, DOUGLAS D. COHEN AND RENEE  
COHEN AS TRUSTEES OF HYANNIS  
HARBORVIEW RESORT CONDOMINIUM  
TRUST,

By their attorneys,

/s/ Leonard H. Freiman

Leonard H. Freiman (BBO #560233)

Goulston & Storrs

A Professional Corporation

400 Atlantic Avenue

Boston, Massachusetts 02110-3333

(617) 482-1776

[lfreiman@goulstonstorrs.com](mailto:lfreiman@goulstonstorrs.com)

Dated: July 8, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8<sup>th</sup> day of July 2005, I served copies of the foregoing Defendants' Assented to Motion to Extend the Time for the Filing of its Rule 26(a)(2) Expert Designation and Disclosures by causing copies thereof to be forwarded in the manner indicated below to:

**(via electronic mail and first class mail)**

John P. Fuller, Esq.  
Fuller, Fuller & Associates, P.A.  
12000 Biscayne Blvd., Suite 609  
North Miami, FL 33181

/s/ Leonard H. Freiman

Leonard H. Freiman